

**SheppardMullin**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 4/30/2025

Sheppard, Mullin, Richter & Hampton LLP  
30 Rockefeller Plaza  
New York, New York 10112-0015  
212.653.8700 main  
212.653.8701 fax  
www.sheppardmullin.com

212.286.0611 direct  
mgilbert@sheppardmullin.com

April 30, 2025

**MEMO ENDORSED**

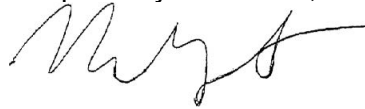
The Honorable Valerie E. Caproni  
United States District Court Judge for the Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street,  
New York, NY 10007

Re: *United States v. Donte Goulbourne* et al, 23-cr-00544 (S.D.N.Y.)

Dear Judge Caproni:

On behalf of Donte Goulbourne, a defendant in the above-captioned case, we respectfully request that the conditions of Mr. Goulbourne's pretrial release be altered so that his GPS ankle monitor may be removed on May 19, 2025 to allow for his self-surrender on May 21. We understand that he will not be able to self-surrender to his designated facility with his GPS ankle monitor still on. Pretrial does not object to this request. The Government defers to Pretrial.

Respectfully Submitted,



Michael J. Gilbert  
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Connie Dang, Assistant U.S. Attorney

Application GRANTED. The conditions of Defendant's pretrial release are modified to permit Pretrial Services to remove his GPS ankle monitor on May 19, 2025, to facilitate his self-surrender to his designated facility.

SO ORDERED.



4/30/2025

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE